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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

RAMON TORRES HERNANDES, and
FAMILIAS UNIDAS POR LA
JUSTICIA, AFL-CIO, a labor
organization,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
LABOR and MILTON AL STEWART,
in his official capacity as United States
Secretary of Labor,

Defendants.

No. 1:20-CV-03241-SMJ

MOTION TO EXPEDITE

02/24/21
Without Oral Argument

The United States Department of Labor Defendants, through counsel, submit the
following motion to expedite consideration of their Motion to Take Judicial Notice
filed at ECF No. 54. Plaintiffs do not oppose the motion.

Expedited consideration of the motion is necessary because the subject of the
motion, the 2021 Adverse Effect Wage Rates (“AEWRs”) that took effect yesterday,
may be pertinent to the Court’s forthcoming ruling on Plaintiffs’ Revised Motion for
Preliminary Injunction.

1 DATED this 24th day of February, 2021.
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4 William D. Hyslop
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7 s/ John T. Drake
8 John T. Drake
9 Jessica A. Pilgrim
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11 *Attorneys for U.S. DOL Defendants*
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CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2021, I caused to be delivered via the method listed below the document to which this Certificate of Service is attached (plus any exhibits and/or attachments) to the following:

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Kathleen Phair Barnard BARNARD IGLITZIN & LAVITT, LLP 18 West Mercer Street, Suite 400 Seattle, WA 98119	<input checked="" type="checkbox"/> CM/ECF System <input type="checkbox"/> Electronic Mail <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Other: _____

s/John T. Drake
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